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HONORABLE HAROLD BAER
U.S. DISTRICT JUDGE
S.D.N.Y.

George E. Murray
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April 23, 2008

Honorable Harold Baer, Jr.
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 2230
New York, NY 10007
Facsimile: (212) 805-7901

Via Fax

USDS SDNY
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Re: Eastwind Maritime S.A. v. Tonnevold Reefer 7 KS
S.D.N.Y. Index No. 08 CV 3292 (HB)
Our ref.: 500115.019

Dear Judge Baer:

We represent the plaintiff, Eastwind Maritime S.A., in the above-captioned matter, and write to respectfully request a three week extension, from May 9, 2008 to May 30, 2008, of Plaintiff Eastwind Maritime S.A.'s time to serve and file its opposition to Defendant Tonnevold Reefer 7 KS's motion for countersecurity for the reasons set forth below.

Please know that Defendant has raised in its counterclaim issues that are currently being arbitrated in New York against a different entity, ECo Shipping Ltd. which is represented by a separate law firm, Messrs. Poles, Tublin, and we will need time to review the filings in that matter and obtain an affidavit from John G. Poles, who is lead counsel for ECo Shipping Ltd. in that matter. Moreover, I am lead counsel for Eastwind Maritime S.A. in this matter and I will be married on Saturday April 26, 2008 with my honeymoon in Iceland to follow until May 12, 2008.

Please note that the Defendant has not moved to vacate the attachment in this matter and the instant motion is limited to whether our client Eastwind Maritime S.A. is obligated to post countersecurity. Eastwind Maritime S.A. has an office in New York City. Therefore, this request for an extension of time should not affect the Defendant's ability to obtain countersecurity, if its motion is successful. We would of course be amenable to any extension of time for the Defendant to reply to our papers.

Plaintiff has not previously requested an extension of time in this matter. No party will be prejudiced by this request. I have contacted Defendant's counsel but he would only consent on a condition unacceptable to my client.

In accordance with your Individual Practice Rule 1.E I have attached a copy of the docket report for this matter. If there are any questions, please do not hesitate to contact us. We thank this Honorable Court in advance for its attention and understanding.

Respectfully submitted,
CHALOS, O'CONNOR & DUFFY

~~George E. Murray~~

cc: Via Fax
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Attorneys for Defendant
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New York, NY 10007-3189
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Attn: William J. Honan, Esq.
Christopher R. Nolan, Esq.

George E. Murray

I will give you vent as
Mass 3rd - being particular.
I might caution you however
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CHALOS, O'CONNOR & DUFFY LLP Harold Baer, Jr., U.S.D.J. 2

Harold Baer Jr., U.S.D.J. 2

Date: 7/27/06

Endorsement:

I will give you until May 30 - congratulations. I might caution you however about the extent of your valid largesse to your adversary - if memory serves you can only grant adjournments of time tables in the Federal Rules, e.g., pleadings with the Court's permission. Further while I'm glad to let you have a honeymoon in Iceland if your adversary has any valid objection he is welcome to write and I to change my mind.